

**Air Pollution Control District
Jefferson County, Ky
6 December 2000**

TITLE V PERMIT SUMMARY

Company: Kentucky Manufacturing Company

Plant Location: 2601 S 3rd Street, Louisville, KY 40208-1408

Date App. Received: 15 December 1994

Date Admin. Complete: 23 February 1995

Date of Draft Permit: 2 July 2000

Date of Proposed Permit: 11 September 2000

District Engineer: Mike Carter

Permit No.: 90-97-TV

Plant ID: 0109

SIC Code: 3715

NAICS: 337125

AFS: 00109

Introduction:

This permit will be issued pursuant to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as of the date above as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), and particulate matter less than 10 microns (PM₁₀); unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}); and is a moderate non-attainment area for ozone (O₃).

Application Type/Permit Activity:

☒ Initial Issuance

☐ Permit Revision

☐ Administrative

☐ Minor

☐ Significant

☐ Permit Renewal

Compliance Summary:

☒ Compliance certification signed

☐ Compliance schedule included

☐ Source is out of compliance

I. Source Description

1. **Class I Area Impacts:** This source is not located in or near a Class I area.
2. **Product Description:** Kentucky Manufacturing Company manufactures large, open and closed trailers for over the road hauling via semi tractor/trailer rigs.
3. **Overall Process Description:** Trailers are fabricated/assembled, cleaned, painted and undercoated.
4. **Site Determination:** There are no other facilities which are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**

U-1 Boilers Two industrial boilers for plant heating. Each boiler uses natural gas as the primary fuel and No. 2 distillate oil for secondary fuel.

U-2 Painting Operation Total painting operations for semi-trailers. The total painting operations consist of four spray booths, a floor coating area and a touch-up painting area.

U-3 Steam Cleaning Steam cleaning process using applicators and a chemical mixing station.

U-4 Gasoline Refueling Gasoline refueling operation consisting of one 1000 gallon above ground gasoline storage tank.
6. **Fugitive Sources:** Paint flash-off areas.
7. **Title V Major Source Status by Pollutant:**

Pollutant	Actual Emissions (tpy) 1998 Data	Major Source Status (Based on PTE)
CO	2.2	No
NO _x	3.0	No
SO ₂	Negligible	No
PM	Negligible	No
VOC	95.45	Yes
Single HAP (> 1 TPY)		
Ethyl Benzene	5.47	No

Pollutant	Actual Emissions (tpy) 1998 Data	Major Source Status (Based on PTE)
Methyl Isobutyl Ketone	6.4	Yes
Methyl Ethyl Ketone	Negligible	Yes
Polycyclic Organic Matter	Negligible	Yes
Toluene	7.85	Yes
Xylene	31.94	Yes
Total HAPs	54.45	Yes

8. **MACT Standards:** No MACT standards apply.

9. **Applicable Requirements:**

☐ PSD ☒ NSPS ☒ SIP ☐ MACT
☐ NSR ☐ NESHAPS ☒ District-Origin ☐ Other

10. **Referenced Federal Regulations in Permit:**

40 CFR 60 Subpart A General Provisions

40 CFR 60 Subpart Dc Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units

II. Regulatory Analysis

- Emission and Operating Caps:** The source is subject to a VOC emission limit of 171.26 tons per year for Emission Unit U-2. This emission limit is in accordance with Kentucky Manufacturing Company's Title V Application, Form 9400-E, this limit is to avoid Regulation 2.04. The source is subject to a production limit of 34 trailers per day according to District Regulation 7.59, section 5.1.3 and the source's election of this option.
- Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.
- Operational Flexibility:** The source requested the authority to use any combination of raw materials for Emissions Units U-2 and U-3 as may be required by future customer requests, etc.
- Testing Requirements:** Testing is specified in the permit.

5. **Monitoring, Recordkeeping and Reporting Requirements:** Monitoring, record keeping, and reporting are specified in the permit. Periodic monitoring is accomplished by the following:
- a. Calculations of SO₂ emissions, based on the applicable AP-42 emission factor, clearly demonstrate that the SO₂ emission standard cannot be exceeded when using 0.5% S fuel oil and operating at design capacity; therefore, no additional record keeping or monitoring is required.
 - b. Calculations of PM emissions, based on the appropriate AP-42 emission factor, clearly demonstrate that the PM emission standard cannot be exceeded when operating at design capacity; therefore, no additional record keeping or monitoring is required.
 - c. Monitoring of VOC emissions shall be done by recording the amount of paints, solvents, sealants, etc. used each day to demonstrate that the emission limits are not exceeded.
6. **Off-Permit Documents:** 1.18 Rule Effectiveness plan dated December 13, 1994

The District considers an “off-permit document” as a document on which a source’s compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source’s Title V Operating Permit. The designation “off-permit document” shall be made at the District’s discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, PMPs, MOCS; or other documents which are too voluminous to be included in a source’s Title V Operating Permit, as determined by the District.

III. Other Requirements

1. **Temporary Facilities:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Compliance Schedule/Progress Reports:** The source has certified compliance with all applicable requirements; therefore, no compliance schedule or progress reports are necessary.
4. **Emissions Trading:** None
5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
6. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any source that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not use any of the listed chemicals.

7. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR 68 Subpart F and Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
8. **Insignificant Activities:** The following activities identified in the Title V permit application have been determined by the District to be insignificant.

Insignificant Activities		
Description	Quantity	Basis
Gasoline powered forklift fleet	1	Regulation 2.02, section 2.2
Minor Fuel Combustion Units (Space heaters)	23	Regulation 2.02, section 2.1.1
Air make-up systems for paint booths (Minor Fuel Combustion)	2	Regulation 2.02, section 2.1.1
Brazing, soldering, or welding equipment	Various	Regulation 2.02, section 2.3.4

- A. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- B. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- I. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
- ii. No periodic monitoring shall be required for facilities designated as insignificant activities.